

**NELSON MULLINS RILEY & SCARBOROUGH LLP**

Jahmy S. Graham (SBN 300880)  
jahmy.graham@nelsonmullins.com  
Priscilla Szeto (SBN 305961)  
priscilla.szeto@nelsonmullins.com  
Crispin L. Collins (SBN 311755)  
crispin.collins@nelsonmullins.com  
19191 South Vermont Avenue, Suite 900  
Torrance, CA 90502  
Telephone: 424.221.7400  
Facsimile: 424.221.7499

Attorneys for Defendant  
TAWKIFY, INC.

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO

JEREMY STANFIELD, on behalf of himself  
and all others similarly situated,

Plaintiff,

v.

TAWKIFY, INC., et al.; and DOES 1 -25,

Defendants.

Case No. 3:20-cv-07000-WHA

Assigned to Hon. William H. Alsup

**NOTICE OF ERRATA AND  
CORRECTION TO TAWKIFY, INC.'S  
SUPPLEMENTAL BRIEFING RE  
CONVERTED MOTION FOR  
SUMMARY JUDGEMENT**

Hearing Date: August 12, 2021

Hearing Time: 8:00 a.m.

Courtroom: 12

Date Removed: October 7, 2020

Date Filed: August 17, 2020

**TO THE COURT AND PLAINTIFF IN THIS ACTION:**

**PLEASE TAKE NOTICE THAT** Defendant Tawkify, Inc. (“Tawkify”), through its undersigned counsel, hereby provides notice of errata and correction as follows:

On July 9, 2021, Tawkify filed its “Corrected Supplemental Briefing Re: Converted Motion for Summary Judgment” (the “MSJ Briefing”) (Dkt. 89) and its Corrected “Declaration of Jahmy S. Graham in Support of Defendant Tawkify, Inc.’s Motion for Summary Judgment” (“Graham Declaration” or “Graham Decl.”). (Dkt. 89-1.) Due to inadvertent clerical errors, the MSJ Briefing contained one exhibit citation that was incorrectly numbered, and two pages from Exhibit Z of the Graham Declaration (pp. 252-53 of Plaintiff’s Deposition Transcript) were inadvertently omitted. The corrected citation is identified below for the Court’s and parties’ reference, and the missing two deposition transcript pages inadvertently omitted from Exhibit Z of the Graham Declaration is attached herewith as Exhibit 1.

<i><b>Page/ Line</b></i>	<i><b>Fact</b></i>	<i><b>Citation in Brief</b></i>	<i><b>Corrected Citation</b></i>
9:21-26	“...she declined to meet with Plaintiff again . . . ‘What was he thinking?’”	(Schultz Decl., Ex. E)	<b>Schultz Decl., Ex. D</b>

Dated: July 12, 2021

Respectfully submitted,

NELSON MULLINS RILEY & SCARBOROUGH LLP

By: /s/ Jahmy S. Graham  
 Jahmy S. Graham  
 Priscilla Szeto  
 Crispin L. Collins

Attorneys for Defendant  
 TAWKIFY, INC.

**CERTIFICATE OF SERVICE**

I hereby certify that on July 12, 2021, I electronically filed the forgoing with the Clerk of court using the CM/ECF system and I served a copy of the forgoing pleading on all counsel for all parties via the CM/ECF system and/or mailing same by United States Mail, properly addressed, and first class postage prepaid, to all counsel of record in this matter.

I declare that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on July 12, 2021 at Torrance, California.

Jahmy S. Graham  
Jahmy S. Graham

By: /s/ Jahmy S. Graham  
Signature